



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

April 4, 2024

**BY ECF**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: *Maritime Legal Solutions v. U.S. Transp. Command*, No. 23 Civ. 7045 (KPF)

Dear Judge Failla:

This Office represents defendant the United States Transportation Command in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”). I write respectfully, together with plaintiff, to request that the initial pretrial conference presently scheduled for April 10, 2024 (ECF No. 18) be rescheduled to May 31, 2024, or a date thereafter that is convenient for the Court, with a corresponding extension of time for the parties’ preconference submissions, currently due April 4, 2024.

This is the fourth request by either party to adjourn the conference; the Court granted the three prior requests. Defendant previously made a production of documents in response to plaintiff’s FOIA request. After consultation with plaintiff’s counsel, Defendant is exploring whether additional documents may be released by early May, and will be preparing a *Vaughn* index. In addition, the defendant agency provided contractors an opportunity to object to the proposed release of documents they had submitted to the agency, and the agency will be notifying them of its final decision with respect to release of their documents shortly.

The requested adjournment is in the interest of efficiency, as it allows for the contractors to receive reasonable notice of the decision to release their documents; enables Defendant to explore whether additional documents may be released; and allows the parties to continue their discussion regarding any additional concerns plaintiff may have with the productions and to confer regarding next steps in advance of appearing before the Court. The undersigned will also be on pre-scheduled leave from April 16 through April 29, 2024.

The parties thank the Court for its consideration of this letter.

Respectfully submitted,

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United States Attorney for the  
Southern District of New York  
*Attorney for Defendant*

By: /s/ Joseph A. Pantoja  
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cc: *Counsel of record* (by ECF)

Application GRANTED. The conference scheduled for April 10, 2024, is hereby ADJOURNED to **June 11, 2024**, at **12:00 p.m.** As before, the conference will be telephonic, and the dial-in information is as follows: At the aforementioned date and time, the parties are to call (888) 363-4749 and enter access code 5123533.

The parties shall provide their joint pre-conference submissions on or before **June 6, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket entry 19.

Dated: April 4, 2024  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE